RESIDENTIAL UTILITY CONSUMER OFFICE
www.azruco.gov

1110 WEST WASHINGTON · SUITE 220 · PHOENIX, ARIZONA 85007 · PHONE: (602) 364-4835 · FAX: (602) 364-4846

Katie Hobbs
Governor

Cynthia Zwick
Director

November 2, 2026

Docket Control
Arizona Corporation Commission
1200 West Washington Street
Phoenix, AZ 85007

Re: In the Matter of the Application of UNS Gas, Inc. for the Establishment of Just and Reasonable Rates and Charges Designed to Realize a Reasonable Rates and Charges Designed to Realize a Reasonable Rate of Return on the Fair Value of the Properties of UNS Gas, Inc. Devoted to its Operations Throughout the State of Arizona and For Related Approvals (Docket No. G-04204A-24-0237)

On October 30, 2026, the Residential Utility Consumer Office ("RUCO") submitted the attached Informal Challenge to UNS Gas, Inc., relating to the Annual Adjustment Rate Mechanism ("ARAM") Annual Update application pending in the docket above.

Very Truly Yours,

/s/ Sarah Barrios Cool

Sarah Barrios Cool
Attorney, Residential Utility Consumer Office

CC: Daniel Pozefsky, Chief Counsel; UNS Gas Rate Case Service List.

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Director

October 30, 2026

VIA ELECTRONIC MAIL
Bradley S. Carroll
Megan C. Hill
UNS GAS, INC.
88 East Broadway Blvd., MS HQE910
P. O. Box 711
Tucson, Arizona 85702

Michael W. Patten
OSBORN MALEDON
2929 North Central Avenue, Suite 2000
Phoenix, Arizona 85012

Re: **RUCO's Informal Challenge regarding Publication Date of September 1, 2026**

Dear Ms. Hill and Messers. Patten and Carol:

This letter and its attachments comprise RUCO's Informal Challenge relating to the Company's Application for an ARAM adjustment with a Publication Date of September 1, 2026. Pursuant to Unisource Gas's ("UNSG's" or "the Company's") protocols, at Section III.b., RUCO has sent a copy of this Informal Challenge to the Company via its Unisource Gas ARAM Information Request/Informal Challenge Form online at uesaz.com/aram-information-request-form/.

Section III.b. also provides "Interested Parties" such as RUCO may "notify the Company in writing of any specific challenges, including challenges related to Accounting Changes, to the application of the Formula Rate Template ("Informal Challenge"). . . . A party submitting an Informal Challenge must specify the inputs, supporting explanations, allocations, calculations, or other information to which it objects, and provide an appropriate explanation and documents to support its challenge." Accordingly, RUCO specifies the following:

/ / /

Revenue Increase; Use of Equity v. Debt; Application of Earned ROE to ARAM Trigger.

RUCO has several issues with the requested revenue increase of $6.1 million in the Company's annual ARAM filing. First, UNSG had recently received a $9.7 million increase in their authorized revenue requirement in their 2024 traditional rate case (Docket No. G-04204A-24-0237) after relying on rates set from 2012. The $6.1 million requested ARAM revenue increase is approximately 63% of the increase approved in the most recent rate case, and yet less than a year has passed since Decision No. 81653 versus the twelve years between the traditional rate cases. Logically speaking, if UNSG were to request another revenue increase in its first ARAM filing, it should be a much smaller percentage of the revenue deficiency calculated and determined in the 2024 case which was meant to recoup the deficiency of relying on rates set in 2012.

The Company's Annual Update Application (at 2) states: "...the Commission-approved ARAM protocols support a non-fuel increase of approximately $6.1 million. The requested increase equals a 7.7 percent increase in non-fuel revenues and an approximately 5 percent increase in total operating revenues." Essentially, UNSG's revenue request is increasing by $15.8 million in less than a year, when summing Decision No. 81653 and the first ARAM filing's requested revenue increase. This figure is actually less than the original requested revenue increase of $14.0 million in the 2024 rate case application, which demonstrates the severity and extreme impact from formula rates. This counters the concept of gradualism; the ratepayer receives a large jump in rates in the rate case, and a year later they receive another large jump and face more annual increases moving forward. While the brevity and magnitude of this requested revenue increase is a major issue, another is the devolving financial profile of UNSG throughout their rate case and to this ARAM filing. From 2011 through 2024, its median earned ROE was 9.49%, which would be well within the current authorized deadband.[1] However, excluding 2014 (when UNSG was acquired by Fortis), its earned ROE reported in the 2024 rate case was 5.21%, far lower than any other years in the Company's past fifteen years. The next lowest earned ROE's were 7.60% in 2023 and 7.67% in 2021, and after that 8.80% in 2022. This sudden decrease in earned ROE in 2024 came from an additional $30 million in long-term debt accrued in that year, which was the main component in raising the total capital from $243.2 million in 2023 to $280.1 million.[2] Because of the resulting higher synchronized interest and the substantially larger total capital amount, the earned ROE will naturally be significantly lower because their operating revenues remained approximately the same with a much unhealthier financial profile.

For reference, from 2018 to 2023 its total capital went from approximately $199 million to $243 million, an increase of 22.1% or about 3.6% a year. Between 2023 and 2024 total capital increased by an additional 18.6% in one year alone, about the same amount accumulated in the prior six years. With this financial profile, UNSG's net income would need to have an

[1] *See* CONFIDENTIAL Attachment A (Company's Response to DR 11.06 re Earned ROE); because the document is treated as CONFIDENTIAL, it is not submitted online to the docket. It has been sent to the Company, however.

[2] *See* Company's rate case application in docket no. ending 24-0237.

accompanying 20% increase in one year alone to maintain its earned ROE from the year before, which is largely unfeasible given their revenues are mostly determined by gas rates which remain relatively stable.

The jump in total capital between 2023 and 2024 does not fully explain the reported 6.97% earned ROE in the ARAM filing, however; total capital increased an additional $30 million in between 2024 and 2026 from $280 million to $310 million. Summing it up, total capital has increased by approximately $67 million dollars in three years, fueled almost entirely by long-term debt.[3] This increase of almost 30% in a relatively short period of time has tanked the company's earned ROE over the past few years as UNSG's gas revenues stay flat. Thus, ratepayers are forced to have two substantial rate hikes because of UNSG's worsening financial profile, and have yet to see the increased efficiencies or expansions since UNSG's revenues have not seen the accompanying increase.

In Decision No. 74689,[4] the Arizona Corporation Commission ("Commission") approved UNSG's merger with Fortis. Fortis agreed to invest $220 million of equity in UNS Energy (parent company of Tucson Electric Power and UniSource Energy Services) following the closing of the merger, an increase from the initial $200 million plan.[5] Despite this agreement, in 2024 and again in 2025, UNS Gas took out $30 million in debt, rather than using equity infusions from Fortis. The foregoing specifies RUCO's challenge to the calculation of the Company's earned ROE and utilization of debt versus equity in a way that implicates the triggering of an Annual Update.

Opaque Bill Impacts; Inability to Verify Impact of Request and Applied Rate Design

The leading benefit that the ARAM is supposed to deliver to customers is gradualism. UNSG's first ARAM Update is not transparent and does not include bill impacts. RUCO requested Schedules H and G to verify the Company's assertion in its Annual Update application that "The Annual Update rate adjustment results in an average bill impact of $2.24 per month, or 4.6 percent, for the typical residential customer using 45 therms per month" Annual Update at 1. Prior to the Decision this year in UNSG's general rate case, the Company had not been in for a rate case since 2012. After 14 years without a base rates increase, the Commission found that the residential customer annual monthly bill should be increased approximately $6.13, or 13.7% for the average usage of 45 therms, and $5.63, or 19.3% for the median usage of 25 therms.[6] Now, if the Company's calculation of the bill impacts are correct, the typical residential customer using 45 therms per month will see a $2.24 per month, or 4.6% percent, increase.

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[3] *Id.*

[4] https://docket.images.azcc.gov/0000156333.pdf?i=1793124474218

[5] *See* https://www.utilitydive.com/news/uns-fortis-merger-clears-last-hurdle/297799/; https://ca.finance.yahoo.com/news/fortis-inc-acquisition-uns-energy-193000361.html; https://www.globenewswire.com/news-release/2014/05/16/1470532/0/en/fortis-and-uns-energy-file-settlement-agreement.html.

[6] *See* Decision 81653 at 70.

RUCO has attempted to obtain Schedules G and H in order to verify what the bill impacts are and have transparency. To this point, the Company has not provided Schedules G and H. RUCO anticipates seeing the Schedules in connection with the Company's response to outstanding data requests.

Once RUCO has the Schedules G and H, it can determine whether are issues in connection with the bill impacts, rate design, disproportionate impact on any residential rate tiers or classes, and reserves this issue.

ARAM Annual Update Time Period Recommendation: Open for discussion.

According to UNS Gas's September 1, 2026, Annual Update (at page 2), "The rates approved in the Company's most recent general rate case were based on a test year ending June 30, 2024, with a 12-month-post-test-year period through June 30, 2025, for rate base additions." The Company also states that "For operating expenses, the Annual Update uses a 12-month test year ending June 30, 2026, which is two years removed from the June 30, 2024, test year used to establish current rates," and "As a result, this filing reflects the effects of two years of cost inflation and other cost changes that have occurred since rates were last set." But, Decision No. 81653 set new rates effective March 1, 2026 (Decision No. 81653 at 137) (i.e., two years have not passed since rates were last set. It has only been 8 months). Moreover, it is not consistent with the protocols that the ARAM be based on one historical test year for the ARAM Update to account for inflationary effects of 24 months of expenses and 18 months of cumulative rate base addition. Annual Update at 2. RUCO continues to investigate this issue.

RUCO Can Only Audit Some of the Requested Plant Additions

It is nearly impossible to tell whether the plant requested in this ARAM Update is used, useful, and prudent because the total plant requested in this ARAM update won't be in the ground until December 31, 2026. That's a fundamental flaw with allowing post test year plant in the ARAM to begin with. Year 1 of the ARAM covers 18 months of new plant (July 1, 2025 to December 31, 2026). Years 2 through 5 will each add an additional 12 months of new plant (January 1, 2027 to December 31, 2027, and so on). The ARAM Annual Update is filed September 1 of each ARAM year and only contains the new plant additions added during the ARAM test year (July 1, 2025 to June 30, 2026). Those extra six months of post test-year plant UNSG can recover each year aren't in the Annual Update filing because they haven't happened yet. As a result, RUCO can only review 12 of the 18 total months of plant in this Year 1 ARAM Update before the clock runs out.

This will be a perennial issue for any interested party like RUCO. In years 2 through 5, RUCO will only be able to review 6 months of the total 12 month plant request before the deadline to file an informal challenge and request information lapses. That's not a review. That's not transparency. That's cutting interested parties out of examining the largest part of any rate increase.

Rate Base and Plant Additions

1. Project 253901A - UNSG Training Facility

Amount challenged: $95,200

Upon RUCO's review, RUCO does not have sufficient information to determine whether the UNSG training facility is a project that benefits ratepayers. The ARAM filing and subsequent RUCO data request 2.38 materials do not sufficiently describe the training conducted at this facility, how the facility is used, who uses it, or how the facility benefits UNS Gas customers. The project information provided does not establish whether the facility is used for training that directly provides safe and reliable gas service to customers, whether the full facility is needed for that purpose, or why the full capital cost should be borne by customers. RUCO challenges the inclusion of this project's cost and requests that UNS Gas remove the challenged amount from rate base and the ARAM revenue requirement.

2. Project 250938A - Weight Bench Combo for Exercise

Amount challenged: $1,849.64

Based on RUCO's review of the Company's filing, the Weight Bench Combo is not used to provide gas utility service or this project cost does not benefit customers. The equipment appears to be an employee fitness amenity and not an asset necessary to provide gas service to customers. RUCO challenges the inclusion of this project's cost and requests that UNS Gas remove the full amount from rate base and the ARAM revenue requirement.

3. Project 255900A -New Fence

Amount challenged: $22,402.03+$1250

RUCO's review of this project in the ARAM filing did not identify the specific property protected by the fence or establish whether it protects gas utility facilities or an undeveloped parcel. The filing also does not explain why a new fence was needed. If the fence replaces an existing one, the Company has not established the old fence's condition, installation date, useful life, or the reason for replacing it. RUCO challenges the inclusion of this project's cost and requests that UNS Gas remove the challenged amount from rate base and the ARAM revenue requirement. The current review does not establish that the fence serves a necessary customer-related purpose or that replacing it was prudent.

4. Project DF22731-251100A - Flagstaff 2-Inch Steel Gas Line Outside Dedicated Easement

Amount challenged: $222,207.78

According to RUCO data request 4.07, this project involves a gas main located outside a dedicated easement that the Company is relocating which happens to be private property. RUCO's review of the filing and related data request responses did not establish why the main was outside the easement, identify the authorized pipeline corridor, or explain how the encroachment was discovered. The materials also do not establish when the original main was placed in service or how much of its useful life remained when it was abandoned. Also because of the need to expedite relocation as a result of pressures from the developer, this project according to data request. 2.44, caused an extra $54,987 from the original estimated cost.

The filing and data request responses do not explain how the remaining cost of the abandoned main is treated in the ARAM or whether any undepreciated balance is included along with the cost of the relocated main. They also do not establish whether obtaining a new easement was a reasonable alternative, or whether relocation was the least-cost reasonable solution.
Because these issues are not explained, RUCO cannot determine whether the relocation costs are necessary and prudent. Also, why should customers pay for this cost if mains were wrongfully installed initially. RUCO challenges recovery of the costs associated with the relocated main and requests that UNS Gas remove those costs from rate base and the ARAM revenue requirement.

5. Project DP22209-253100A - Prescott 2-Inch Steel Gas Main Outside Right-of-Way

Amount challenged: $232,492.13

This project involves a Prescott 2-inch steel gas main located outside the right-of-way that the Company is relocating which happens to be private property. RUCO's review of the filing and related data request responses did not establish why the main was outside the right-of-way, whether the Company had legal authority to maintain it there, or when the issue was discovered. The materials also do not explain why relocation was necessary or whether a less costly option, such as obtaining the necessary property rights, was considered.

The filing and data request responses do not explain how the remaining cost of the abandoned main is treated in the ARAM or whether any undepreciated balance is included along with the cost of the relocated main. They also do not establish that relocation was the least-cost reasonable solution.

Because these issues are not explained, RUCO cannot determine whether the relocation costs are necessary and prudent costs of providing gas service. The customers should not have to pay for this cost if mains were wrongfully installed initially. RUCO challenges recovery of the costs associated with the relocated main and requests that UNS Gas remove those costs from rate base and the ARAM revenue requirement.

7. Project DA10361-250975A - SCBAs for All UNSG Districts

Amount challenged: $1,004,808.90

The responses to RUCO Data Requests 2.45 and 4.06 contain conflicting information about the useful life of the SCBA air tanks purchased in 2006 and 2007. The filing and responses do not clarify which service life applies, when each tank was due for replacement, or why the Company chose to replace the tanks together rather than in phases. It is also unclear if replacement of these instruments is done in a timely manner.

Because the replacement timing and schedule are not explained, RUCO cannot determine whether these costs were necessary and prudently incurred. RUCO challenges the inclusion of the SCBA replacement costs and requests that UNS Gas remove them from rate base and the ARAM revenue requirement.

8. New Meters - AMR-to-AMI Compatibility - Recommendation: Exclude costs for any meter that is incompatible with the planned AMI system or is expected to be replaced before the end of its useful life.

UNS Gas plans to transition from AMR to AMI. The record does not establish whether the new meters included in this Annual Update will be retained and integrated into the AMI system or replaced during the transition. Including meters that will be replaced before the end of their useful lives could make customers pay for overlapping investments. RUCO challenges the inclusion of costs for any meter that is incompatible with the planned AMI system or is expected to be replaced before the end of its useful life. RUCO requests that UNS Gas remove those costs from rate base and the ARAM revenue requirement.

9. DA10394-250973A UNSG Fixed Network Replacement

Amount challenged: $1.871,475

Based on RUCO's review of Data Request 4.03 and 2.45 this project is part of UNS Gas's larger transition from AMR to AMI across its system. The Company appears to still be developing the project and identifying suitable communication sites for a test run, including installing poles and constructing communication sites. The project therefore appears to be in a testing and development stage, rather than currently providing service to customers. RUCO challenges including these costs in rate base at this time because the project has not been shown to be used and useful in serving customers. RUCO requests that UNS Gas remove the challenged costs from rate base and the ARAM revenue requirement.

Depreciation Expenses and Account 374

Schedule E-2 reports depreciation expense of $18,547,257, while the accumulated-depreciation roll-forward shows an annual movement of approximately $15,888,544 a difference of about $2,658,713. The filing materials do not reconcile these amounts plus an additional 222,980 indicated within the Formula Rate Template.[7]

Regarding account 374, the account's accumulated-depreciation balance moves from negative $56,742.51 to positive $64,711.54, largely because of a $124,844.77 transfer. RUCO is investigating this change, and needs clarification to determine whether there is an error.

Thank you in advance for your attention to the submission of this Informal Challenge.

Sincerely,

/s/ Sarah Barrios Cool

Sarah Barrios Cool
sbarrioscool@azruco.gov
Attorney, RUCO

[7] UNSG ARAM filling schedule A4, line 16.

CONFIDENTIAL

ATTACHMENT A

COMPANY RESPONSE TO DR 11.06

ATTACHMENT B

RUCO 1.07

ACCUMULATED DEPRECIATION

026

June 2024	Depreciation	Retirements	Cost of Removal	Salvage	Transfers	June 2025	Depreciation	Retirements	Cost of Removal	Salvage	Transfers	June 2026
105,353.30	11,573.40	-	-	-	-	116,926.70	12,656.16	-	-	-	(54,349.57)	75,233.29
25,662.99	58,760.43	(85,701.34)	-	-	-	(1,277.92)	288,043.61	-	-	-	35,042.10	321,807.79
131,016.29	**70,333.83**	**(85,701.34)**	**-**	**-**	**-**	**115,648.78**	**300,699.77**	**-**	**-**	**-**	**(19,307.47)**	**397,041.08**
70,348.50	948.72	-	-	-	-	71,297.22	1,008.72	-	-	-	339.59	72,645.53
10,067.08	249.12	-	-	-	-	10,316.20	256.92	-	-	-	61.24	10,634.36
12,600,753.33	289,418.52	-	6,979.90	-	-	12,897,151.75	284,648.60	-	-	-	251,782.26	13,433,582.61
2,173,130.70	39,744.12	-	-	-	-	2,212,874.82	40,223.04	-	-	-	21,894.69	2,274,992.55
177,972.80	3,113.16	-	-	-	-	181,085.96	178.44	-	-	-	1,208.74	182,473.14
15,032,272.41	**333,473.64**	**-**	**6,979.90**	**-**	**-**	**15,372,725.95**	**326,315.72**	**-**	**-**	**-**	**275,286.52**	**15,974,328.19**
												-
(55,240.16)	2,973.83	(4,476.18)	-	-	-	(56,742.51)	4,243.34	(7,634.06)	-	-	124,844.77	64,711.54
23,984.21	3,431.76	-	-	-	-	27,415.97	3,913.12	-	-	-	(3,083.81)	28,245.28
129,969,173.11	4,785,897.35	(2,512,514.73)	(394,296.21)	-	-	131,848,259.52	5,168,809.33	(1,545,459.50)	(282,404.90)	-	(2,062,174.01)	133,127,030.44
2,688,149.48	159,189.14	(54,161.16)	(13,814.42)	-	-	2,779,363.04	156,855.06	(10,687.88)	(15,567.53)	-	(16,574.27)	2,893,388.42
2,231,031.83	131,712.55	(5,926.30)	(2,749.69)	-	-	2,354,068.39	131,282.96	(528.06)	(6,428.03)	-	(169,863.03)	2,308,532.23
80,140,287.69	4,932,918.33	(793,810.32)	(153,144.61)	-	-	84,126,251.09	4,972,758.48	(1,202,278.56)	(116,732.35)	-	3,346,087.01	91,126,085.67
9,067,765.33	939,058.06	(1,003,207.75)	-	-	-	9,003,615.64	1,184,970.94	(758,503.42)	-	-	(485,236.33)	8,944,846.83
2,648,967.31	321,885.70	(251,297.60)	(336,862.39)	-	-	2,382,693.02	408,079.17	(290,611.31)	(385,132.40)	-	(708,232.51)	1,406,795.97
2,797,175.42	120,452.23	-	-	-	-	2,917,627.65	121,977.04	-	-	-	(183,717.49)	2,855,887.20
1,639,085.87	116,967.12	-	-	-	-	1,756,052.99	120,872.87	-	-	-	(113,000.89)	1,763,924.97
1,288,853.68	77,389.34	(219,753.09)	(201.84)	-	-	1,146,288.09	70,450.26	(88,194.83)	(107.13)	-	97,016.06	1,225,452.45
1,764,290.25	61,189.33	-	(66.40)	-	-	1,825,413.18	55,891.24	-	51.18	-	(103,797.04)	1,777,558.56
234,203,524.02	**11,653,064.74**	**(4,845,147.13)**	**(901,135.56)**	**-**	**-**	**240,110,306.07**	**12,400,103.81**	**(3,903,897.62)**	**(806,321.16)**	**-**	**(277,731.54)**	**247,522,459.56**
171,463.78	3,059.38	-	-	-	-	174,523.16	1,085.52	(42,000.00)	-	-	0.00	133,608.68
5,160,859.16	813,809.67	(18,108.01)	(18,996.59)	-	-	5,937,564.23	790,919.50	(313,500.59)	(90,352.87)	-	(57,241.36)	6,267,388.91
2,528,366.90	658,951.97	(749,218.19)	-	-	-	2,438,100.68	744,518.86	(660,525.51)	-	-	247,151.50	2,769,245.53
9,295,824.86	731,189.44	(1,022,510.96)	(30,614.02)	99,456.61	(123,728.49)	8,949,617.44	578,124.59	(837,187.74)	(14,257.88)	107,804.06	(409,890.72)	8,374,209.75
188,535.62	9,143.88	-	-	-	-	197,679.50	9,097.92	(15,445.15)	-	-	(15,406.30)	175,925.97
2,930,471.17	269,817.76	(58,465.33)	-	-	-	3,141,823.60	309,072.45	(169,821.77)	-	-	(101,936.46)	3,179,137.82
53,093.94	4,999.23	(57,338.48)	-	-	-	754.69	3,681.96	-	-	-	5,485.94	9,922.59
1,811,091.85	138,999.04	(287,712.39)	(3,140.97)	113,387.39	-	1,772,624.92	132,961.06	(182,728.02)	(12,835.77)	104,034.46	249,337.35	2,063,394.00
1,502,363.88	276,947.03	(121,930.89)	-	-	-	1,657,380.02	287,049.71	(52,084.37)	-	-	68,775.40	1,961,120.76
295,990.46	4,617.24	(248,037.92)	-	-	-	52,569.78	4,913.52	-	-	-	(10,140.36)	47,342.94
23,938,061.62	**2,911,534.64**	**(2,563,322.17)**	**(52,751.58)**	**212,844.00**	**(123,728.49)**	**24,322,638.02**	**2,861,425.09**	**(2,273,293.15)**	**(117,446.52)**	**211,838.52**	**(23,865.01)**	**24,981,296.95**
273,304,874.34	**14,968,406.85**	**(7,494,170.64)**	**(946,907.24)**	**212,844.00**	**(123,728.49)**	**279,921,318.82**	**15,888,544.39**	**(6,177,190.77)**	**(923,767.68)**	**211,838.52**	**(45,617.50)**	**288,875,125.78**
		(920,137.54)										

Excerpts from UNSG Response To RUCO Informal Data Request 4.11

UNS Gas, Inc.
Summary of Revenues by Customer Class
Present and Proposed Revenues
Test Year Ended June 30, 2024

Line No.	Rate Description		Test Year Net Revenue	Net Increase	Proposed % Increase to Test Year	Adjusted Test Year Revenue	Proposed Dollar Increase	Proposed % Increase to Adjusted Test Year	Proposed Net Revenue
1	**Class Summary**		$	$	%	$	$	%	$
2	Residential		$47,259,624	$7,103,139	15.0%	$47,630,969	$6,731,794	14.1%	$54,362,763
3	Small Volume General Service		$14,422,190	$1,438,259	10.0%	$14,389,763	$1,470,686	10.2%	$15,860,448
4	Large Volume General Service		$5,651,915	$1,518,989	26.9%	$5,645,220	$1,525,684	27.0%	$7,170,904
5		Subtotal	$67,333,729	$10,060,386	14.9%	$67,665,952	$9,728,163	14.4%	$77,394,115
6	**Other Operating Revenue**		$1,316,611	0	N/A	$1,316,611	N/A	N/A	$1,316,611
7		**Total**	**$68,650,340**	**$10,060,386**	**14.7%**	**$68,982,563**	**$9,728,163**	**14.1%**	**$78,710,726**

Supporting Schedules
H-2-2

Recap Schedules
A-1

Links
Other Operating Revenues - Revenue Requirement Model

UNS Gas, Inc.
Summary of Revenues by Customer Class
Present and Proposed Revenues
Test Year Ended June 30, 2024

Sub Account	Rate Id	Rate Description and UOM	Current Rates	Proposed Rates	Increase $	Increase %
5751	GRRES	**Residential Gas Service**				
		Basic Service Charge Per Month	$10.00	$11.94	$1.94	19%
		Basic Service Charge Per Month Adder, w/ LFCR	$1.50000	$0.000000	-$1.500000	-100%
		Delivery Charge, per Therm	$0.34340	$0.380100	$0.036700	11%
		PGA	$0.44050	$0.44670	N/M	N/M
5752	GRRESC	**Residential CARES Gas Service**				
		Basic Service Charge Per Month	$7.00	$11.94	$4.94	71%
		Basic Service Charge Per Month Adder, w/ LFCR	$1.500000	$0.000000	-$1.500000	-100%
		Delivery Charge, per Therm	$0.343400	$0.380100	$0.036700	11%
		PGA	$0.44050	$0.44670	N/M	N/M
5753	GGSVS	**Small Volume Commercial Service**				
		Basic Service Charge Per Month	$20.00	$28.32	$8.32	42%
		Delivery Charge, per Therm	$0.283700	$0.313400	$0.029700	10%
		PGA	$0.44050	$0.44670	$0.006200	1%
5765	GPSVS	**Small Volume Public Authority Service**				
		Basic Service Charge Per Month	$20.00	$28.32	$8.32	42%
		Delivery Charge, per Therm	$0.284100	$0.313400	$0.029300	10%
		PGA	$0.44050	$0.44670	$0.006200	1%
5758	GISVS	**Small Volume Industrial Service**				
		Basic Service Charge Per Month	$20.00	$28.32	$8.32	42%
		Delivery Charge, per Therm	$0.306100	$0.313400	$0.007300	2%
		PGA	$0.44050	$0.44670	$0.006200	1%
5754	GGLVS	**Large Volume Commercial Service**				
		Basic Service Charge Per Month	$225.00	$285.73	$60.73	27%
		Delivery Charge, per Therm	$0.210400	$0.162000	-$0.048400	-23%
		PGA	$0.44050	$0.44670	$0.006200	1%
5766	GPLVS	**Large Volume Public Authority Service**				
		Basic Service Charge Per Month	$225.00	$285.73	$60.73	27%
		Delivery Charge, per Therm	$0.15	$0.16	$0.01	6%
		PGA	$0.44050	$0.44670	$0.006200	1%
5763	GPCNGSV	**Compressed Natural Gas-Public Auth**				
		Basic Service Charge Per Month	$20.00	$28.32	$8.32	42%
		Delivery Charge, per Therm	$0.28	$0.31	$0.03	10%
		PGA	$0.44050	$0.44670	$0.006200	1%
5763	GRCNG	**Compressed Natural Gas-Residential Service**				
		Basic Service Charge Per Month	$10.00	$11.94	$1.94	19%
		Delivery Charge, per Therm	$0.343400	$0.380100	$0.036700	11%
		PGA	$0.44050	$0.44670	$0.006200	1%
5759	GILVS	**Large Volume Industrial Service**				
		Basic Service Charge Per Month	$225.00	$285.73	$60.73	27%
		Delivery Charge, per Therm	$0.124800	$0.162000	$0.037200	30%
		PGA	$0.44050	$0.44670	$0.006200	1%
5755	GGIRS	**Irrigation Service**				
		Basic Service Charge Per Month	$20.00	$28.32	$8.32	42%
		Delivery Charge, per Therm	$0.353200	$0.313400	-$0.039800	-11%
		PGA	$0.44050	$0.44670	$0.006200	1%
5756	GTNILVS	**Transportation NSP LV Industrial**				
		Basic Service Charge Per Month	$225.00	$285.73	$60.73	27%
		Delivery Charge, per Therm	$0.124800	$0.162000	$0.037200	30%
		PGA	$0.44050	$0.44670	$0.006200	1%
5756	GTNGLVS	**Transportation NSP LV General Service**				
		Basic Service Charge Per Month	$225.00	$285.73	$60.73	27%
		Delivery Charge, per Therm	$0.210400	$0.162000	-$0.048400	-23%
		PGA	$0.44050	$0.44670	$0.006200	1%

Residential Gas Service - GRRES

ANNUAL

BILL IMPACTS CURRENT RATES

	Therms	Basic Service Charge per month	Delivery Charge	PGA	TCJA	Net Bill	LFCR	Total Bill
Small	25	$10.00	$8.59	$11.01	-$0.40	$29.20	$0.06	$29.25
Medium	66	$10.00	$22.66	$29.07	-$1.06	$60.67	$0.11	$60.79
Large	112	$10.00	$38.46	$49.34	-$1.80	$95.99	$0.18	$96.17
XLg	144	$10.00	$49.45	$63.43	-$2.32	$120.56	$0.23	$120.79
AnnAvg	45	$10.00	$15.50	$19.89	-$0.73	$44.66	$0.08	$44.75

BILL IMPACTS PROPOSED RATES

	Therms	Basic Service Charge per month	Delivery Charge	PGA	TEAM	Net Bill	$ Change	% Change	LFCR	CEM	SIB	Total Bill	$ Change	% Change
Small	25	$11.94	$9.50	$11.17	$0.00	$32.61	$3.42	11.7%	$0.06	$0.00	$0.00	$32.67	$3.42	11.7%
Medium	66	$11.94	$25.09	$29.48	$0.00	$66.51	$5.83	9.6%	$0.13	$0.00	$0.00	$66.63	$5.84	9.6%
Large	112	$11.94	$42.57	$50.03	$0.00	$104.54	$8.55	8.9%	$0.20	$0.00	$0.00	$104.74	$8.57	8.9%
XLg	144	$11.94	$54.73	$64.32	$0.00	$131.00	$10.44	8.7%	$0.25	$0.00	$0.00	$131.25	$10.46	8.7%
AnnAvg	45	$11.94	$17.16	$20.17	$0.00	$49.27	$4.60	10.3%	$0.09	$0.00	$0.00	$49.36	$4.61	10.3%

JANUARY

BILL IMPACTS CURRENT RATES

	Therms	Basic Service Charge per month	Delivery Charge	PGA	TCJA	Net Bill	LFCR	Total Bill
Small	93	$10.00	$31.94	$40.97	-$1.50	$81.41	$0.15	$81.56
Medium	133	$10.00	$45.67	$58.59	-$2.14	$112.12	$0.21	$112.33
Large	180	$10.00	$61.81	$79.29	-$2.90	$148.20	$0.28	$148.48
XLg	219	$10.00	$75.20	$96.47	-$3.53	$178.15	$0.34	$178.48
Avg	101	$10.00	$34.67	$44.47	-$1.63	$87.52	$0.16	$87.68

Residential Gas Service - GRRES

JANUARY — **BILL IMPACTS PROPOSED RATES**

	Therms	Basic Service Charge per month	Delivery Charge	PGA	TEAM	Net Bill	$ Change	% Change	LFCR	CEM	SIB	Total Bill	$ Change	% Change
Small	93	$11.94	$35.35	$41.54	$0.00	$88.83	$7.43	9.1%	$0.17	$0.00	$0.00	$89.00	$7.44	9.1%
Medium	133	$11.94	$50.55	$59.41	$0.00	$121.90	$9.79	8.7%	$0.23	$0.00	$0.00	$122.13	$9.80	8.7%
Large	180	$11.94	$68.42	$80.41	$0.00	$160.76	$12.56	8.5%	$0.30	$0.00	$0.00	$161.07	$12.59	8.5%
XLg	219	$11.94	$83.24	$97.83	$0.00	$193.01	$14.86	8.3%	$0.36	$0.00	$0.00	$193.37	$14.89	8.3%
Avg	101	$11.94	$38.38	$45.10	$0.00	$95.42	$7.90	9.0%	$0.18	$0.00	$0.00	$95.60	$7.92	9.0%

JULY — **BILL IMPACTS CURRENT RATES**

	Therms	Basic Service Charge per month	Delivery Charge	PGA	TCJA	Net Bill	LFCR	Total Bill
Small	11	$10.00	$3.78	$4.85	-$0.18	$18.45	$0.03	$18.48
Medium	18	$10.00	$6.18	$7.93	-$0.29	$23.82	$0.04	$23.87
Large	28	$10.00	$9.62	$12.33	-$0.45	$31.50	$0.06	$31.56
XLg	35	$10.00	$12.02	$15.42	-$0.56	$36.87	$0.07	$36.94
Avg	14	$10.00	$4.75	$6.09	-$0.22	$20.62	$0.04	$20.65

JULY — **BILL IMPACTS PROPOSED RATES**

	Therms	Basic Service Charge per month	Delivery Charge	PGA	TEAM	Net Bill	$ Change	% Change	LFCR	CEM	SIB	Total Bill	$ Change	% Change
Small	11	$11.94	$4.18	$4.91	$0.00	$21.03	$2.59	14.0%	$0.04	$0.00	$0.00	$21.07	$2.59	14.0%
Medium	18	$11.94	$6.84	$8.04	$0.00	$26.82	$3.00	12.6%	$0.05	$0.00	$0.00	$26.87	$3.00	12.6%
Large	28	$11.94	$10.64	$12.51	$0.00	$35.09	$3.59	11.4%	$0.07	$0.00	$0.00	$35.16	$3.60	11.4%
XLg	35	$11.94	$13.30	$15.63	$0.00	$40.88	$4.01	10.9%	$0.08	$0.00	$0.00	$40.96	$4.02	10.9%
Avg	14	$11.94	$5.26	$6.18	$0.00	$23.37	$2.76	13.4%	$0.04	$0.00	$0.00	$23.41	$2.76	13.4%

Residential CARES Gas Service - GRRESC

ANNUAL

BILL IMPACTS CURRENT RATES

	Therms	Basic Service Charge per month	Delivery Charge	Delivery Charge, over 100	PGA	TCJA	Net Bill	LFCR	Total Bill
Small	44	$7.00	$8.51	$0.00	$19.38	-$0.71	$34.18	$0.06	$34.25
Medium	65	$7.00	$12.47	$30.60	$28.41	-$1.04	$77.45	$0.15	$77.59
Large	86	$7.00	$16.63	$24.42	$37.88	-$1.38	$84.55	$0.16	$84.71
XLg	103	$7.00	$19.92	$19.44	$45.37	-$1.66	$90.07	$0.17	$90.24
AnnAvg	48	$7.00	$9.26	$0.00	$21.10	-$0.77	$36.59	$0.07	$36.66

ANNUAL

BILL IMPACTS PROPOSED RATES

	Therms	Basic Service Charge per month	Delivery Charge	Delivery Charge, over 100	PGA	TEAM	Net Bill	$ Change	% Change	LFCR	CEM	SIB	Total Bill	$ Change	% Change
Small	44	$15.00	$16.72	$0.00	$6.63	$0.00	$38.35	$4.17	10.9%	$0.07	$0.00	$0.00	$38.43	$4.18	10.9%
Medium	65	$15.00	$24.52	$28.52	$12.05	$0.00	$80.09	$2.64	3.3%	$0.15	$0.00	$0.00	$80.24	$2.65	3.3%
Large	86	$15.00	$32.69	$21.68	$17.73	$0.00	$87.10	$2.55	2.9%	$0.16	$0.00	$0.00	$87.27	$2.56	2.9%
XLg	103	$15.00	$39.15	$16.17	$22.22	$0.00	$92.54	$2.47	2.7%	$0.17	$0.00	$0.00	$92.72	$2.48	2.7%
AnnAvg	48	$15.00	$18.21	$0.00	$7.66	$0.00	$40.87	$4.27	10.5%	$0.08	$0.00	$0.00	$40.94	$4.28	10.5%

January

BILL IMPACTS CURRENT RATES

	Therms	Basic Service Charge per month	Delivery Charge	Delivery Charge, over 100	PGA	TCJA	Net Bill	LFCR	Total Bill
Small	78	$7.00	$15.09	$0.00	$34.36	-$1.26	$55.19	$0.10	$55.29
Medium	113	$7.00	$21.85	$61.20	$49.78	-$1.82	$138.01	$0.26	$138.27
Large	149	$7.00	$28.82	$48.83	$65.63	-$2.40	$147.89	$0.28	$148.16
XLg	178	$7.00	$34.43	$38.87	$78.41	-$2.87	$155.84	$0.29	$156.14
Avg	84	$7.00	$16.26	$0.00	$37.03	-$1.35	$58.93	$0.11	$59.05

Residential CARES Gas Service - GRRESC

January

	BILL IMPACTS PROPOSED RATES														
	Therms	Basic Service Charge per month	Delivery Charge	Delivery Charge, over 100	PGA	TEAM	Net Bill	$ Change	% Change	LFCR	CEM	SIB	Total Bill	$ Change	% Change
Small	78	$15.00	$29.65	$0.00	$15.62	$0.00	$60.26	$5.07	9.2%	$0.11	$0.00	$0.00	$60.38	$5.09	8.4%
Medium	113	$15.00	$42.95	$57.05	$24.87	$0.00	$139.87	$1.86	1.3%	$0.26	$0.00	$0.00	$140.13	$1.86	1.3%
Large	149	$15.00	$56.63	$43.37	$34.38	$0.00	$149.38	$1.50	1.0%	$0.28	$0.00	$0.00	$149.66	$1.50	1.0%
XLg	178	$15.00	$67.66	$32.34	$42.05	$0.00	$157.05	$1.20	0.8%	$0.30	$0.00	$0.00	$157.34	$1.20	0.8%
Avg	84	$15.00	$31.95	$0.00	$17.22	$0.00	$64.17	$5.24	8.9%	$0.12	$0.00	$0.00	$64.29	$5.24	8.2%

July

	BILL IMPACTS CURRENT RATES								
	Therms	Basic Service Charge per month	Delivery Charge	Delivery Charge, over 100	PGA	TCJA	Net Bill	LFCR	Total Bill
Small	10	$7.00	$1.93	$0.00	$4.41	-$0.16	$13.18	$0.02	$13.20
Medium	16	$7.00	$3.09	$0.00	$7.05	-$0.26	$16.88	$0.03	$16.92
Large	23	$7.00	$4.45	$0.00	$10.13	-$0.37	$21.21	$0.04	$21.25
XLg	28	$7.00	$5.42	$0.00	$12.33	-$0.45	$24.30	$0.05	$24.34
Avg	12	$7.00	$2.27	$0.00	$5.17	-$0.19	$14.25	$0.03	$14.28

July

	BILL IMPACTS PROPOSED RATES														
	Therms	Basic Service Charge per month	Delivery Charge	Delivery Charge, over 100	PGA	TEAM	Net Bill	$ Change	% Change	LFCR	CEM	SRB	Total Bill	$ Change	% Change
Small	10	$15.00	$3.80	$0.00	-$2.36	$0.00	$16.44	$3.27	24.8%	$0.03	$0.00	$0.00	$16.47	$3.27	24.8%
Medium	16	$15.00	$6.08	$0.00	-$0.77	$0.00	$20.31	$3.43	20.3%	$0.04	$0.00	$0.00	$20.35	$3.43	20.3%
Large	23	$15.00	$8.74	$0.00	$1.08	$0.00	$24.82	$3.61	17.0%	$0.05	$0.00	$0.00	$24.87	$3.62	17.0%
XLg	28	$15.00	$10.64	$0.00	$2.40	$0.00	$28.04	$3.74	15.4%	$0.05	$0.00	$0.00	$28.10	$3.76	15.4%
Avg	12	$15.00	$4.46	$0.00	-$1.90	$0.00	$17.56	$3.31	23.2%	$0.03	$0.00	$0.00	$17.60	$3.32	23.2%

Compressed Natural Gas-Residential Service - GRCNG

ANNUAL

BILL IMPACTS CURRENT RATES

	Therms	Basic Service Charge per month	Delivery Charge	PGA	TCJA	Net Bill	LFCR	Total Bill
Small	0	$10.00	$0.00	$0.00	$0.00	$10.00	$0.01	$10.01
Medium	12	$10.00	$3.95	$5.07	-$0.19	$18.83	$0.02	$18.85
Large	74	$10.00	$25.41	$32.60	-$1.19	$66.82	$0.08	$66.90
XLg	74	$10.00	$25.41	$32.60	-$1.19	$66.82	$0.08	$66.90
AnnAvg	40	$10.00	$13.69	$17.56	-$0.64	$40.62	$0.05	$40.67

BILL IMPACTS PROPOSED RATES

	Therms	Basic Service Charge per month	Delivery Charge	PGA	TEAM	Net Bill	$ Change	% Change	LFCR	CEM	SIB	Total Bill	$ Change	% Change
Small	0	$11.94	$0.00	$0.00	$0.00	$11.94	$1.94	19.4%	$0.02	$0.00	$0.00	$11.96	$1.95	19.5%
Medium	12	$11.94	$4.37	$5.14	$0.00	$21.45	$2.62	13.9%	$0.03	$0.00	$0.00	$21.48	$2.63	14.0%
Large	74	$11.94	$28.13	$33.06	$0.00	$73.12	$6.31	9.4%	$0.09	$0.00	$0.00	$73.21	$6.31	9.4%
XLg	74	$11.94	$28.13	$33.06	$0.00	$73.12	$6.31	9.4%	$0.09	$0.00	$0.00	$73.21	$6.31	9.4%
AnnAvg	40	$11.94	$15.16	$17.81	$0.00	$44.91	$4.29	10.6%	$0.06	$0.00	$0.00	$44.97	$4.30	10.6%

JANUARY

BILL IMPACTS CURRENT RATES

	Therms	Basic Service Charge per month	Delivery Charge	PGA	TCJA	Net Bill	LFCR	Total Bill
Small	-	$10.00	$0.00	$0.00	$0.00	$10.00	$0.01	$10.01
Medium	8	$10.00	$2.75	$3.52	-$0.13	$16.14	$0.02	$16.16
Large	129	$10.00	$44.30	$56.82	-$2.08	$109.05	$0.14	$109.18
XLg	129	$10.00	$44.30	$56.82	-$2.08	$109.05	$0.14	$109.18
Avg	67	$10.00	$22.84	$29.29	-$1.07	$61.06	$0.08	$61.13

Compressed Natural Gas-Residential Service - GRCNG

JANUARY

BILL IMPACTS PROPOSED RATES

	Therms	Basic Service Charge per month	Delivery Charge	PGA	TEAM	Net Bill	$ Change	% Change	LFCR	CEM	SIB	Total Bill	$ Change	% Change
Small	-	$11.94	$0.00	$0.00	$0.00	$11.94	$1.94	19.4%	$0.02	$0.00	$0.00	$11.96	$1.95	19.5%
Medium	8	$11.94	$3.04	$3.57	$0.00	$18.55	$2.41	14.9%	$0.03	$0.00	$0.00	$18.58	$2.42	15.0%
Large	129	$11.94	$49.03	$57.62	$0.00	$118.60	$9.55	8.8%	$0.15	$0.00	$0.00	$118.74	$9.56	8.8%
XLg	129	$11.94	$49.03	$57.62	$0.00	$118.60	$9.55	8.8%	$0.15	$0.00	$0.00	$118.74	$9.56	8.8%
Avg	67	$11.94	$25.28	$29.71	$0.00	$66.92	$5.86	9.6%	$0.08	$0.00	$0.00	$67.01	$5.88	9.6%

JULY

BILL IMPACTS CURRENT RATES

	Therms	Basic Service Charge per month	Delivery Charge	PGA	TCJA	Net Bill	LFCR	Total Bill
Small	-	$10.00	$0.00	$0.00	$0.00	$10.00	$0.01	$10.01
Medium	15	$10.00	$5.15	$6.61	-$0.24	$21.52	$0.03	$21.54
Large	19	$10.00	$6.52	$8.37	-$0.31	$24.59	$0.03	$24.62
XLg	19	$10.00	$6.52	$8.37	-$0.31	$24.59	$0.03	$24.62
Avg	13	$10.00	$4.55	$5.84	-$0.21	$20.17	$0.03	$20.20

JULY

BILL IMPACTS PROPOSED RATES

	Therms	Basic Service Charge per month	Delivery Charge	PGA	TEAM	Net Bill	$ Change	% Change	LFCR	CEM	SIB	Total Bill	$ Change	% Change
Small	-	$11.94	$0.00	$0.00	$0.00	$11.94	$1.94	19.4%	$0.02	$0.00	$0.00	$11.96	$1.95	19.5%
Medium	15	$11.94	$5.70	$6.70	$0.00	$24.34	$2.83	13.1%	$0.03	$0.00	$0.00	$24.38	$2.84	13.2%
Large	19	$11.94	$7.22	$8.49	$0.00	$27.65	$3.06	12.4%	$0.04	$0.00	$0.00	$27.69	$3.07	12.5%
XLg	19	$11.94	$7.22	$8.49	$0.00	$27.65	$3.06	12.4%	$0.04	$0.00	$0.00	$27.69	$3.07	12.5%
Avg	13	$11.94	$5.04	$5.92	$0.00	$22.90	$2.72	13.5%	$0.03	$0.00	$0.00	$22.93	$2.73	13.5%

Residential Gas Service
Rate Id: GRRES
Sub Account: 5751

Usage Range - Therms

Lower	Upper	billed_therms	bill_count	Cumulative_Bills	Cumulative_Therms	percent_total_bills	percent_total_therms
0	4	364624	193212	193212	364624	11%	0%
5	9	1585319	229882	423093	1949942	23%	2%
10	14	2324831	198714	621807	4274774	34%	5%
15	19	2639939	158053	779860	6914713	43%	8%
20	24	2475368	114018	893878	9390081	49%	12%
25	29	2390698	89587	983465	11780779	54%	14%
30	34	2296945	72633	1056098	14077724	58%	17%
35	39	2235760	61137	1117236	16313484	62%	20%
40	44	2276609	54788	1172024	18590093	65%	23%
45	49	2314183	49725	1221749	20904276	67%	26%
50	54	2359593	45812	1267561	23263869	70%	29%
55	59	2431350	43068	1310629	25695219	72%	32%
60	64	2485426	40488	1351117	28180645	74%	35%
65	69	2602420	39221	1390338	30783065	77%	38%
70	74	2598712	36442	1426780	33381777	79%	41%
75	79	2662202	34907	1461686	36043979	81%	44%
80	84	2658990	32741	1494427	38702970	82%	48%
85	89	2645205	30697	1525124	41348175	84%	51%
90	94	2574692	28250	1553374	43922866	86%	54%
95	99	2456476	25571	1578945	46379342	87%	57%
100	104	2365072	23420	1602365	48744414	88%	60%
105	109	2270822	21435	1623800	51015236	90%	63%
110	114	2139860	19295	1643095	53155096	91%	65%
115	119	2041693	17625	1660719	55196789	92%	68%
120	124	1923904	15922	1676642	57120693	92%	70%
125	129	1808904	14378	1691019	58929597	93%	72%
130	134	1612392	12333	1703352	60541989	94%	74%
135	139	1540004	11355	1714707	62081993	95%	76%
140	144	1447195	10293	1724999	63529188	95%	78%
145	149	1317578	9051	1734051	64846766	96%	80%
150	154	1203714	7994	1742045	66050480	96%	81%
155	159	1122566	7220	1749266	67173046	96%	83%
160	164	1025349	6391	1755657	68198395	97%	84%
165	169	967836	5852	1761509	69166231	97%	85%
170	174	846919	4970	1766479	70013150	97%	86%
175	179	787044	4490	1770969	70800194	98%	87%
180	184	717531	3980	1774949	71517725	98%	88%
185	189	663499	3583	1778531	72181225	98%	89%
190	194	628354	3304	1781836	72809579	98%	90%
195	199	573902	2940	1784776	73383482	98%	90%
200	299	5377413	23183	1807959	78760895	100%	97%
300	399	1337292	3999	1811958	80098187	100%	98%
400	499	523386	1200	1813158	80621572	100%	99%
500	999	559822	898	1814056	81181394	100%	100%
1000	1999	125115	95	1814152	81306510	100%	100%
2000	10000	44287	16	1814168	81350797	100%	100%

Average Monthly Customers	151,181
Average Monthly Therm per Customer	45
Median therms per Customer	25

Residential CARES Gas Service

Rate Id: GRRESC
Sub Account: 5752

Usage Range - Therms

Lower	Upper	billed_therms	bill_count	Cumulative_Bills	Cumulative_Therms	percent_total_bills	percent_total_therms
0	4	14415	6396	6396	14415	9%	1%
5	9	76236	11352	17748	90651	25%	4%
10	14	100853	8773	26520	191504	38%	8%
15	19	116887	7123	33643	308391	48%	12%
20	24	95489	4485	38128	403880	55%	16%
25	29	91715	3504	41632	495596	60%	20%
30	34	86657	2790	44422	582252	64%	23%
35	39	84048	2341	46763	666300	67%	27%
40	44	90791	2226	48989	757092	70%	30%
45	49	86620	1898	50886	843712	73%	34%
50	54	93296	1846	52732	937008	76%	38%
55	59	95605	1726	54458	1032613	78%	41%
60	64	97235	1613	56071	1129848	80%	45%
65	69	91703	1409	57480	1221552	82%	49%
70	74	98981	1415	58895	1320532	85%	53%
75	79	94433	1263	60158	1414965	86%	57%
80	84	94779	1190	61348	1509744	88%	61%
85	89	84185	995	62342	1593929	89%	64%
90	94	79781	892	63235	1673710	91%	67%
95	99	79024	839	64073	1752734	92%	70%
100	104	71911	725	64798	1824645	93%	73%
105	109	65914	634	65432	1890558	94%	76%
110	114	61189	562	65995	1951747	95%	78%
115	119	54294	478	66473	2006042	95%	80%
120	124	54782	462	66934	2060824	96%	83%
125	129	46757	379	67313	2107581	97%	84%
130	134	41044	320	67633	2148625	97%	86%
135	139	35521	267	67900	2184146	97%	88%
140	144	27723	201	68100	2211869	98%	89%
145	149	29085	203	68304	2240955	98%	90%
150	154	29081	197	68501	2270035	98%	91%
155	159	23406	153	68654	2293441	99%	92%
160	164	18040	115	68769	2311481	99%	93%
165	169	19194	118	68887	2330674	99%	93%
170	174	16306	97	68984	2346980	99%	94%
175	179	15653	91	69075	2362633	99%	95%
180	184	13896	79	69154	2376529	99%	95%
185	189	10680	59	69212	2387209	99%	96%
190	194	11131	60	69272	2398341	99%	96%
195	199	9971	52	69324	2408312	99%	97%
200	299	71383	317	69641	2479695	100%	99%
300	399	12013	38	69679	2491708	100%	100%
400	499	2679	7	69686	2494387	100%	100%

Average Monthly Customers	5,807
Average Monthly Therm per Customer	36
Median therms per Customer	21